

*United States Attorney  
Southern District of New York*

February 24, 2022

**BY ECF**

Honorable Jesse M. Furman  
United States District Judge  
Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007

**Re: *United States v. Joshua Adam Schulte*,  
S3 17 Cr. 548 (JMF)**

Dear Judge Furman:

The Government writes to respectfully request permission to file an omnibus response to the defendant's January 28, 2022 motions (filed and pending classification review) of no more than 65 pages. By order dated January 18, 2022, the Court expanded the page limit for the defendant's opening brief from 55 to 65 pages, with Government to file an opposing brief of the same length. (D.E. 674). The defendant then filed a 65-page opening brief. On February 15, 2022, the Court issued a scheduling order providing, *inter alia*, that the Government would file "a single omnibus memorandum of law, not to exceed 55 pages, in opposition" to the defendant's motions by February 25, 2022. (D.E. 711 at 2). In light of the above, the Government respectfully requests permission to file a response of not more than 65 pages.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

by: /s/  
David W. Denton, Jr. / Michael D. Lockard  
Assistant United States Attorneys  
(212) 637-2744 / -2193

cc: Standby counsel (by ECF and email)  
Joshua Adam Schulte (by mail)